

RANDALL S. LUSKEY (SBN: 240915)
rluskey@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (628) 432-5100
Facsimile: (628) 222-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)
ratkins@paulweiss.com

JACQUELINE P. RUBIN (*Pro Hac Vice* admitted)
jrubin@paulweiss.com

CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)
cgrusauskas@paulweiss.com

ANDREA M. KELLER (*Pro Hac Vice* admitted)
akeller@paulweiss.com

**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**

1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

[Additional Counsel Listed on Following Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED] ORDER
REGARDING CERTAIN FACT SHEET
DEADLINES**

This Document Relates to:

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER
REGARDING CERTAIN FACT SHEET DEADLINES**

Case No. 3:23-md-03084-CRB

1 KYLE N. SMITH (*Pro Hac Vice* admitted)
 2 ksmith@paulweiss.com
 2 JESSICA E. PHILLIPS (*Pro Hac Vice* admitted)
 3 jphillips@paulweiss.com
 3 **PAUL, WEISS, RIFKIND, WHARTON**
& GARRISON LLP
 4 2001 K Street, NW
 5 Washington DC, 20006
 5 Telephone: (202) 223-7300
 6 Facsimile: (202) 223-7420

7 *Attorney for Defendants*
 7 UBER TECHNOLOGIES, INC.,
 8 RASIER, LLC, and RASIER-CA, LLC

9 MICHAEL B. SHORTNACY (SBN: 277035)
 10 mshortnacy@shb.com
 10 **SHOOK, HARDY & BACON, L.L.P.**
 11 2049 Century Park East, Suite 3000
 11 Los Angeles, CA 90067
 12 Telephone: (424) 285-8330
 12 Facsimile: (424) 204-9093

13 PATRICK OOT (*Pro Hac Vice* admitted)
 14 oot@shb.com
 14 **SHOOK, HARDY & BACON, L.L.P.**
 15 1800 K St. NW, Suite 1000
 15 Washington, D.C. 20006
 16 Telephone: (202) 783-8400
 16 Facsimile: (202) 783-4211

17 JEREMIAH S. WIKLER (*Pro Hac Vice* admitted)
 18 jwikler@shb.com
 18 **SHOOK, HARDY & BACON, L.L.P.**
 19 2555 Grand Blvd.
 19 Kansas City, MO 64108
 20 Telephone: (816) 474-6550
 20 Facsimile: (816) 421-5547

21 *Attorney for Defendants*
 22 UBER TECHNOLOGIES, INC.,
 22 RASIER, LLC, and RASIER-CA, LLC

23 C. BROOKS CUTTER
 24 CELINE E. CUTTER
 24 JENNIFER S. DOMER
 25 **CUTTER LAW P.C.**
 25 401 Watt Avenue Suite 100
 26 Sacramento, CA 95864
 26 Telephone: (916) 290-9400
 27 Email: bcutter@cutterlaw.com
 27 Email: ccutter@cutterlaw.com
 28 Email: jdomer@cutterlaw.com

29 *Attorneys for Cutter Law P.C. Plaintiffs*

STIPULATION

2 WHEREAS, on March 19, 2024, the Court entered Pretrial Order No. 10, which states that
3 “Plaintiffs will either submit bona fide ride receipts or the ride information detailed in PTO No. 5,”
4 and that Plaintiffs shall serve either the bona fide ride receipt or Pretrial Order No. 5 information
5 sheet “within 14 days of filing, transfer, or removal to this Court for all cases filed, transferred, or
6 removed after February 1, 2024.” Mar. 19, 2024 Pretrial Order No. 10: Fact Sheet Implementation
7 Order at 3, Dkt. 348. The Court also set the Plaintiff Fact Sheet and Defendant Fact Sheet deadlines
8 for cases filed after March 26, 2024 as follows: “[E]ach Plaintiff must complete and submit a PFS
9 and execute applicable Authorizations within 30 days of the case being filed in, removed to, or
10 transferred to MDL 3084. The Uber Defendants must complete and submit a DFS and produce
11 Responsive Documents, within 30 days after a given plaintiff serves the ride receipt or ride
12 information form” *Id.* at 6;

13 **WHEREAS**, an extension of the deadline for the fact sheet submissions would provide
14 more time to submit accurate fact sheets;

15 **WHEREAS**, the parties have agreed that the deadline to provide either a bona fide ride
16 receipt or a Pretrial Order No. 5 information sheet for any Plaintiff represented by Cutter Law P.C.
17 who joined the MDL by October 15, 2024 should be November 15, 2024;

18 **WHEREAS**, the parties have agreed that the deadline to provide a Plaintiff Fact Sheet for
19 any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 should be
20 December 20, 2024;

21 **WHEREAS**, the parties have agreed that the deadline to provide a Defendant Fact Sheet
22 for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 and
23 who submits either a bona fide ride receipt or a Pretrial Order No. 5 information sheet by November
24 15, 2024 should be March 21, 2025;

25 **WHEREAS**, the parties have agreed that these deadlines may be subject to revision based
26 on further discussion and agreement amongst the parties (or, in the absence of agreement, via
27 application to the Court) about why changed circumstances (e.g., a significant additional volume
28 of filings of cases by other law firms) may warrant further adjustment to the deadlines. Nothing

1 about this stipulation changes any obligations of the parties with respect to requirements set out in
 2 prior orders as to inclusion of the applicable authorizations/responsive documents.

3 **THEREFORE**, the parties respectfully request the Court enter the parties' stipulation
 4 establishing that:

- 5 1. Either a bona fide ride receipt or a Pretrial Order No. 5 information sheet for any
 6 Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024
 7 is due on November 15, 2024;
- 8 2. A Plaintiff Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined
 9 the MDL by October 15, 2024 is due on December 20, 2024;
- 10 3. A Defendant Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined
 11 the MDL by October 15, 2024 and submits either a bona fide ride receipt or a Pretrial
 12 Order No. 5 information sheet by November 15, 2024 is due on March 21, 2025; and
- 13 4. These deadlines may be subject to further revision, by agreement among the parties
 14 or by application to and approval of the Court, as described in the final WHEREAS
 15 clause above.

16 **IT IS SO STIPULATED.**

17
 18 Dated: October 25, 2024

**PAUL, WEISS, RIFKIND, WHARTON &
 GARRISON LLP**

19
 20 By: /s/ Kyle N. Smith
 21 ROBERT ATKINS
 RANDALL S. LUSKEY
 KYLE N. SMITH
 JACQUELINE P. RUBIN
 JESSICA E. PHILLIPS
 CAITLIN E. GRUSAUSKAS
 ANDREA M. KELLER

22
 23
 24 **SHOOK, HARDY & BACON, L.L.P.**

25
 26
 27 MICHAEL B. SHORTNACY
 PATRICK OOT
 JEREMIAH S. WIKLER

28
 29
 30 *Attorneys for Defendants*
 UBER TECHNOLOGIES, INC.,
 RASIER, LLC, and RASIER-CA, LLC

1 Dated: October 25, 2024

CUTTER LAW P.C.

2 By: /s/ Jennifer S. Domer

3 C. Brooks Cutter

4 Celine E. Cutter

5 Jennifer S. Domer

6 401 Watt Avenue Suite 100

7 Sacramento, CA 95864

8 Telephone: (916) 290-9400

9 Email: bcutter@cutterlaw.com

10 Email: ccutter@cutterlaw.com

11 Email: jdomer@cutterlaw.com

12 *Attorneys for Cutter Law P.C. Plaintiffs*

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FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: October 25, 2024

By: /s/ Randall S. Luskey
Randall S. Luskey

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11 | IN RE: UBER TECHNOLOGIES, INC.,
12 | PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER REGARDING
CERTAIN FACT SHEET DEADLINES**

This Document Relates to:

ALL ACTIONS

The Court hereby GRANTS the parties' stipulation as follows:

1. A bona fide ride receipt or Pretrial Order No. 15 information sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 is due on November 15, 2024.
2. A Plaintiff Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 is due on December 20, 2024.
3. A Defendant Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 and submits either a bona fide ride receipt or a Pretrial Order No. 5 information sheet by November 15, 2024 is due on March 21, 2025.
4. These deadlines may be subject to further revision, by agreement among the parties or by application to and approval of the Court, as described in the final WHEREAS clause of the parties' stipulation.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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4 Date: November 8, 2024
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